

Hearing Date: December 28, 2020, at 10:30 a.m. (Prevailing Eastern Time)
Objections Due: December 23, 2020, at 4:00 p.m. (Prevailing Eastern Time)

Lucy F. Kweskin
Matthew A. Skrzynski
PROSKAUER ROSE LLP
Eleven Times Square
New York, New York 10036
Telephone: (212) 969-3000
Facsimile: (212) 969-2900

Jeff J. Marwil (admitted *pro hac vice*)
Jordan E. Sazant (admitted *pro hac vice*)
Brooke H. Blackwell (admitted *pro hac vice*)
PROSKAUER ROSE LLP
70 West Madison, Suite 3800
Chicago, IL 60602
Telephone: (312) 962-3550
Facsimile: (312) 962-3551

Peter J. Young (admitted *pro hac vice*)
PROSKAUER ROSE LLP
2029 Century Park East, Suite 2400
Los Angeles, CA 90067-3010
Telephone: (310) 557-2900
Facsimile: (310) 557-2193

*Attorneys for Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

**CENTURY 21 DEPARTMENT STORES LLC,
et al.,**

Debtors.¹

Chapter 11

Case No. 20-12097 (SCC)

(Jointly Administered)

**NOTICE OF HEARING ON MOTION OF DEBTORS FOR AN ORDER
AUTHORIZING AND APPROVING (A) SALE OF INSURANCE ACTION INTEREST
FREE AND CLEAR OF LIENS, CLAIMS AND ENCUMBRANCES AND
(B) SETTLEMENT WITH GINDI PARTIES**

PLEASE TAKE NOTICE that the Court entered, on December 14, 2020, the *Order
Shortening Notice With Respect To Motion Of Debtors For An Order Authorizing And Approving*

¹ The Debtors in these chapter 11 cases (the “**Chapter 11 Cases**”), along with the last four digits of each Debtor’s federal tax identification number, as applicable, are Century 21 Department Stores LLC (4073), L.I. 2000, Inc. (9619), C21 Department Stores Holdings LLC (8952), Giftco 21 LLC (0347), Century 21 Fulton LLC (4536), C21 Philadelphia LLC (2106), Century 21 Department Stores of New Jersey, L.L.C. (1705), Century 21 Gardens Of Jersey, LLC (9882), C21 Sawgrass Blue, LLC (8286), C21 GA Blue LLC (5776), and Century Paramus Realty LLC (5033). The Debtors’ principal place of business is: 22 Cortlandt Street, 5th Floor, New York, NY 10007.

(A) *Sale Of Insurance Action Interest Free And Clear Of Liens, Claims And Encumbrances And*
(B) *Settlement With Gindi Parties* [ECF No. 326] (the “**Notice Order**”).

PLEASE TAKE NOTICE that, in accordance with the Notice Order, a hearing (the “**Hearing**”) will be held on the *Motion of Debtors for an Order Authorizing and Approving (A) Sale of Insurance Action Interest Free and Clear of Liens, Claims and Encumbrances and (B) Settlement with Gindi Parties* [ECF No. 324] (the “**Motion**,”) before the Honorable Shelley C. Chapman United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004, on **December 28, 2020, at 10:30 a.m. (prevailing Eastern Time)**. The Hearing will be held *telephonically*. Parties that wish to register to listen or to participate may do so through Court Solutions LLC at www.court-solutions.com or by calling (917) 746-7476.

PLEASE TAKE FURTHER NOTICE that any responses or objections (“**Objections**”) to the Motion must:

- i. be in writing;
- ii. specify the name of the objecting party and state with specificity the basis of the Objection(s) and the specific grounds therefor;
- iii. conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York;
- iv. be filed with the Court on the docket of *In re Century 21 Department Stores LLC, et al.*, Case No. 20-12097 (SCC); and
- v. be served upon (a) the Chambers of the Honorable Shelley C. Chapman, United States Bankruptcy Judge for the Bankruptcy Court for the Southern District of New

York, One Bowling Green, New York, NY 10004-1408; (b) attorneys for the Debtors, Proskauer Rose LLP, 70 West Madison, Ste. 3800 Chicago, IL 60602-4342 (Attn: Jeff J. Marwil, Esq.); Eleven Times Square, New York, New York 10036 (Attn: Lucy F. Kweskin, Esq.); (c) the United States Trustee for Region 2, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: Andrea Schwartz, Esq.); (d) counsel to the Committee, Jeffrey L. Cohen (jcohen@lowenstein.com) , Lindsay H. Sklar (lsklar@lowenstein.com) , and Brent Weisenberg (bweisenberg@lowenstein.com); and (e) counsel to the Prepetition Agent, Julia Frost-Davies (julia.frost-davies@morganlewis.com) and David M. Riley (david.riley@morganlewis.com) so as to be received no later than **4:00 p.m. (prevailing Eastern Time) on December 23, 2020** (the “**Objection Deadline**”).

PLEASE TAKE FURTHER NOTICE that if no Objections are timely filed and served with respect to the Motion, the Debtors shall, on or after the Objection Deadline, submit to the Court an order substantially in the form annexed as **Exhibit A** to the Motion, which order the Court may enter with no further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that the Hearing may be continued or adjourned from time to time without further notice other than an announcement of the adjourned date or dates at the Hearing. The Debtors will file an agenda before the Hearing, which may modify or supplement the Motion to be heard at the Hearing.

Dated: December 14, 2020
New York, New York

Respectfully submitted,

/s/ Lucy F. Kweskin

Lucy F. Kweskin
Matthew A. Skrzynski
PROSKAUER ROSE LLP
Eleven Times Square
New York, New York 10036

Telephone: (212) 969-3000
Facsimile: (212) 969-2900
Email: lkveskin@proskauer.com
Email: mskrzynski@proskauer.com

-and-

Jeff J. Marwil (admitted *pro hac vice*)
Jordan E. Sazant (admitted *pro hac vice*)
Brooke H. Blackwell (admitted *pro hac vice*)

PROSKAUER ROSE LLP
70 West Madison, Suite 3800
Chicago, IL 60602-4342
Telephone: (312) 962-3550
Facsimile: (312) 962-3551
Email: jmarwil@proskauer.com
Email: jsazant@proskauer.com
Email: bblackwell@proskauer.com

-and-

Peter J. Young (admitted *pro hac vice*)
PROSKAUER ROSE LLP
2029 Century Park East, Suite 2400
Los Angeles, CA 90067
Telephone: (310) 557-2900
Facsimile: (310) 577-2193
Email: pyoung@proskauer.com

*Attorneys for Debtors
and Debtors in Possession*